

A Letter to the Editor titled "Full disclosure on herbicide use" by Naomi Wagner, was published in the *Ukiah Daily Journal* on May 4, 2016.

Mendocino Redwood Company found a number of comments that would benefit from additional correction, clarification or commentary which are presented on the right side of the page.

Substantial factual information on Mendocino and Humboldt Redwood forests and its practices are available at [www.mrc.com](http://www.mrc.com). Wherever possible we have provided direct links to specific material on our website to help the readers have easy access.

Text of Article <i>Text of article begins below, spaces placed to allow facts to line up with text of article.</i>	<b>Facts about Mendocino Redwood Company</b>
<p>[ BEGINNING OF ARTICLE BELOW]</p>	<p>Mendocino Redwood Company (MRC) was created in 1998 from lands purchased in Mendocino and Sonoma county with the publicly declared mission to be good stewards of the forest and at the same time run a successful business. We have made significant progress in that regard:</p> <ol style="list-style-type: none"> <li>1. Adopting policies to make MRCs forestlands FSC certified (since November 2000);</li> <li>2. Adding more than <u>1 billion board</u> feet of redwood and Douglas fir trees by lowering the rate of harvest;</li> <li>3. Defining of old growth down to the level of an individual tree, along with implementation of a policy to protect all individual old growth trees across our property;</li> <li>4. Elimination of traditional clear cutting from our property;</li> <li>5. Long term investments to improve habitat for fish across the property by controlling or holding back more than 1 million cubic yards of sediment (more than 100,000 dump trucks of dirt) from the coastal streams flowing through our forest;</li> <li>6. Removal of more than 36 long time fish barriers, increasing fish bearing streams by more than 20 miles.</li> <li>7. Operating as an open and transparent business; including an open invitation to take interested individuals anywhere in the forest;</li> </ol>

<p style="text-align: center;">[ BEGINNING OF ARTICLE]</p> <p>Full disclosure on herbicide use</p> <p>To the Editor:</p> <p>Following an upsurge in public concern about herbicide use on timberlands, members of the Hack'n'Squirt Alert! group commented at the Board of Supervisors' April 5 meeting on the potential health and safety threats posed by Mendocino Forest Company and other timber companies' use of the herbicide Imazapyr to kill millions of tanoaks and other hardwoods over thousands of acres of forestland, including many adjacent to rural homes.</p>	<ol style="list-style-type: none"> <li>8. Completing a substantial rebuild of our Ukiah sawmill, assuring that Mendocino County will have infrastructure in the processing of wood products for many years to come; and</li> <li>9. Employing about 300 skilled employees in Mendocino County earning family-level wages and benefits.</li> </ol> <p>MRC was created in 1998 from lands purchased in Mendocino and Sonoma county with the publicly declared mission to be good stewards of the forest and at the same time run a successful business. This set a different, sustainable and better path from the legacy of previous owners. This legacy includes tens of thousands of acres of redwood and Douglas fir forest that are now dominated by tanoak. MRC is committed to restoring these forestlands to the natural balance of conifer and hardwood.</p> <p>Beginning in 1998, when MRC was established, we spent several years on a variety of methods to treat tan oaks (including an ill-fated and expensive effort to make tan oak flooring). After much effort, we concluded the most effective way to bring back a healthy conifer forest in our lifetime was to treat tan oak, selectively, carefully, in the woods, literally tree by tree.</p> <p>Treating tan oak involves using herbicide (about two cups per acre) that is injected directly into the trunk of tan oak trees, following a cut made in the bark. The treatment results in trees dropping most leaves in six to nine months (depending on the time of year), and beginning to fall down within three to four years. After several years, the treated trees largely decompose and their biomass is added to the duff layer of the forest. The treatment of tan oak reduces competition for sunlight and water allowing</p>
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<p>[ARTICLE CONTINUES]</p>	<p>redwood and Douglas fir trees to thrive.</p> <p>Treating tan oak encourages the emergence of a healthier forest by restoring the health of redwood and Douglas fir trees.</p> <p>Since the inception of MRC, approximately 69,000 acres have been restored to a natural conifer balance by controlling tanoak and planting 10.1 million redwood and Douglas fir seedlings.</p> <p>The treatment of tanoak to restore the natural balance of conifer to hardwood is a tool used for at least 25 years. Small private landowners, industrial landowners, and state landowners all use this tool to achieve this goal in a careful and controlled manner according to state regulations.</p> <p>MRC has reviewed its internal policies to encourage fire safety. These include procedures and processes we have used for more than a decade, such as:</p> <ul style="list-style-type: none"><li>a. Partnering with communities to place dedicated fire-water tanks, improve egress for remote neighbors and coordination of activities with local fire districts.</li><li>b. Working in Sacramento to encourage investment in Mendocino county infrastructure through the return of taxes paid locally and deployment of CalFire resources.</li><li>c. Donations of time, equipment and money to Volunteer Fire Departments.</li></ul> <p>MRC strengthened its practices to improve coordinating with local fire districts, fire experts, climate experts and CalFire on pilot projects for fuels hazard reduction and additional road access in the remote parts of the County.</p> <p>The restoration of the forest can occur while providing safety to firefighters and adjacent landowners. There are many examples of wildland fires where firefighters successfully and safely controlled fires in and adjacent to areas where tanoak had been treated. A few examples include the 2008 Mendocino Lightning Complex fires, the Comptche Fire, and the Lodge Fire. In some instances, the fires were controlled in tanoak</p>
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<p>The group also provided educational material about Imazapyr at a table outside the meeting. According to manufacturer Chemtrec’s Material Safety Data Sheet, the herbicide “may decompose if heated or exposed to extreme temperatures”; “when thermally decomposed, may release hazardous and/or toxic fumes”; is “harmful if inhaled” and advises firefighters to wear respirators if fighting a fire where “Imazapyr may be released into the air and water.”</p> <p>Ellen Faulkner summarized the history of hardwoods vs. conifers in relation to the killing off of tanoaks: “The Forest Practice Rules say you can’t cut conifers until there is an adequate ratio of conifers to tan oaks (hardwoods to softwoods) with no more than 15 percent hardwoods. The intention was to let the forest recover before cutting more conifers but the ratio has become skewed toward tanoaks by the continual overcutting of the softwoods. Instead of waiting for conifers to grow tall enough to shade out the oaks, foresters kill the tanoaks to cut the conifers sooner.”</p> <p>Mendocino Redwood Company chooses this management practice because it’s the cheapest way to extract redwood and fir while appearing to comply with mandated ratios.</p> <p>MRC’s hundred-year Habitat Conservation Plan</p>	<p>treatment areas.</p> <p>Material Safety Data Sheets describe measures to ensure the safe handling of a product or chemical. The firefighting precautions describe measures to be taken if the chemical ignites while in storage or transport.</p> <p>The US Forest Service has conducted research on the presence of herbicides in smoke when treated areas of the forest burn. The research included five different herbicides including Imazapyr. The research concluded no herbicide residues are found in smoke when treated areas of the forest burn. For more details on this research see the actual document on MRC’s website at: <a href="http://www.hrcllc.com/wp-content/uploads/2012/01/imapazyrandfire.pdf">http://www.hrcllc.com/wp-content/uploads/2012/01/imapazyrandfire.pdf</a>.</p> <p>Forest Practice Rule 14 CCR 912.7 (d) states “ The percentage of the stocking requirements met with Group A species (conifers) shall be no less than the percentage of the stand basal area they comprised before harvesting.”</p> <p>Tens of thousands of acres of redwood and Douglas fir forest are now dominated by tanoak in Mendocino County. MRC, as well as state and other private forest landowners, is committed to restoring these forestlands to the natural balance of conifer and hardwood.</p> <p>Tanoak treatment and selective management of MRC forestlands is a more expensive style of forest management when compared to evenaged management or clearcutting. Evenage management would remove all the standing tanoak and conifer but MRC policies since its inception in 1998 eliminated clearcutting.</p> <p>MRC’s Draft Habitat Conservation Plan (still under review by many state and federal agencies) calls for</p>
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calls for even-age replanting of genetically modified conifers in the dead tanoak stands. Even-age management is strongly associated with tree farms, clearcutting and herbicides.

In contrast, Faulkner said, Native peoples burned the conifers and cultivated the oaks as a major food source, considering them sacred. “For thousands of years Native people managed the land sustainably. Now, we end up with deforestation, with most of the trees being cut down or poisoned. Hardwoods hold the soil on steep slopes. When you lose your soil, after the fourth cut, you end up looking like Greece.”

Toxic smoke from burning forests inundated with chemicals is a major concern of many residents as well as firefighters. MRC foresters minimize, but do not deny this danger, claiming the herbicide is used in such small quantities as to be “insignificant” and is “less prone to be released in the first year when the trees are still green.” Not reassuringly, it follows that toxic residues may persist in decomposing wood for years.

unevenaged management (selection harvesting) with planting of non-GMO redwood and Douglas fir trees.

MRC voluntarily subjects itself to third part verification of forest practices under the guidelines of the Forest Stewardship Council (FSC) and has done so since 2000. Condition 6.8 of the FSC United States Standards states “The prohibition of genetically modified organisms applies to all organisms including trees.”

MRC was created in 1998 from lands purchased in Mendocino and Sonoma county with the publicly declared mission to be good stewards of the forest and at the same time run a successful business. This set a different, sustainable and better path from the legacy of previous owners. This legacy includes tens of thousands of acres of redwood and Douglas fir forest that are now dominated by tanoak. MRC is committed to restoring these forestlands to the natural balance of conifer and hardwood.

Since the inception of MRC, approximately 69,000 acres have been restored to a natural conifer balance by controlling tanoak and planting 10.1 million redwood and Douglas fir seedlings.

MRC has added more than 1 billion board feet of redwood and Douglas fir trees by lowering the rate of harvest, after accounting for timber harvest.

The US Forest Service has conducted research on the presence of herbicides in smoke when treated areas of the forest burn. The research included five different herbicides including Imazapyr. The research concluded no herbicide residues are found in smoke when treated areas of the forest burn. For more details on this research see the actual document on MRC’s website at: <http://www.hrcllc.com/wp-content/uploads/2012/01/imapazyrandfire.pdf>.

MRC has used over 60,000 tons of Imazapyr on its Mendocino County forestlands to date.

A Firemans' Initiative declaring the leaving of dead standing trees a nuisance has qualified for the June ballot. However, MRC may continue poisoning additional swaths of forestland this year, before and even after the vote, (depending on the outcome and legal challenges) increasing risk by increasing already high fuel loads.

Asserting the public's right to know and raising the question of responsibility for public and environmental health and safety, Hack'n'Squirt Alert! has asked the Supervisors to pass a Resolution for Full Disclosure by all timber companies of their plans to use Imazapyr by filing a public notice disclosing such information two working weeks beforehand. Currently, the only requirement is for the contractor to record the quantity of herbicide used with the county

MRC has used 37.46 tons of herbicide to date to restore 69,000 acres of forestland. On average, two cups per acre of herbicide are needed to bring the conifer/hardwood ratio to natural levels. See detailed information on our website at <http://www.hrcllc.com/monitoring/forest-and-road-restoration/>.

It is common knowledge contemporary forest management can be used as a tool to thin forests, bringing them back to the natural, fire resistant forests they once were. MRC's policy of selectively harvesting forests removes fuel ladders, opens roads in the event a fire occurs, and replaces tanoak with more fire-resistant redwood and Douglas fir.

Recent fires in Mendocino County show little to no correlation between high fire intensity and tanoak treatment areas. In fact, some wildland fires were stopped in areas where tanoak had been treated. The fuel ladders had been removed prior to tanoak treatment, keeping the fire on the ground.

CalFire, the Lead Agency on forest regulations, independently reviews and verifies all Timber Harvest Plans (THPs). THPs are considered a California Environmental Quality Act (CEQA)-equivalent Environmental Review Document. Among many things, CalFire reviews THPs for fire safety and requires mitigations where appropriate.

Ag Department within 30 days after application.

Supervisors Hamburg and Gjerde have expressed support for Full Disclosure, with Woodhouse and McCowen opposed and Brown's position unknown. So far, they have declined to agendaize the Resolution, perhaps waiting to see which way the wind blows in June.

[ END OF ARTICLE]

MRC was created in 1998 from lands purchased in Mendocino and Sonoma county with the publicly declared mission to be good stewards of the forest and at the same time run a successful business.

We are working hard to restore the forest we own and set an example for other forest owners, managers and regulators to be good stewards of the forest and at the same time run a successful business. We have made significant progress in that regard:

1. Adopting policies to make MRCs forestlands FSC certified (since November 2000);
2. Adding more than 1 billion board feet of redwood and Douglas fir trees by lowering the rate of harvest;
3. Defining of old growth down to the level of an individual tree, along with implementation of a policy to protect all individual old growth trees across our property;
4. Elimination of traditional clear cutting from our property;
5. Long term investments to improve habitat for fish across the property by controlling or holding back more than 1 million cubic yards of sediment (more than 100,000 dump trucks of dirt) from the coastal streams flowing through our forest;
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7. Operating as an open and transparent business; including an open invitation to take interested individuals anywhere in the forest;

	<p>8. Completing a substantial rebuild of our Ukiah sawmill, assuring that Mendocino County will have infrastructure in the processing of wood products for many years to come; and</p> <p>9. Employing about 300 skilled employees in Mendocino County earning family-level wages and benefits.</p> <p>MRC is regulated by seven (7) state and federal agencies, including CalFire. Additionally, MRC voluntarily subjects itself to third part verification of forest practices under the guidelines of the Forest Stewardship Council (FSC) and has done so since 2000. We publish our inventory and many other details of our forest management on our website It is straightforward to find information on our management of the forest.</p> <p>From our inception we have encouraged transparency and we have a publicly stated policy of taking anyone to anywhere on the property at any time to see our practices first hand. Please contact John Andersen at 707-272-1177 to arrange for a tour. Additionally, we post our inventory and other forest facts on our website. You can find more information at <a href="http://www.mrc.com">www.mrc.com</a>.</p>
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**Paid for by Mendocino Redwood Company, LLC**